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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ARACELY SOUCEK, et al.,

Plaintiffs,

v.

ROBLOX CORPORATION, et al.,

Defendants.

Case No. 3:23-cv-04146-VC

Judge: Hon. Vince Chhabria

**DECLARATION OF ROBBY L.R. SALDAÑA
IN SUPPORT OF JOINT STIPULATION
BETWEEN PLAINTIFFS AND ROBLOX CORP.
TO ENLARGE TIME FOR ROBLOX TO
RESPOND TO THE SECOND AMENDED
COMPLAINT**

ROBLOX CORPORATION,

Cross-Claimant,

v.

SATOZUKI LIMITED B.V.; RBLXWILD
ENTERTAINMENT LLC; RBLX WILD
ENTERTAINMENT; STUDS
ENTERTAINMENT LTD.; BASED PLATE
STUDIOS LLC; and JOHN DOE #1,

Cross-Defendants.

1 I, Robby L.R. Saldaña, hereby declare as follows:

2 1. I am an attorney licensed in the State of California and admitted to the bar of the
3 Northern District of California with the law firm Cooley LLP and am counsel for Defendant and
4 Cross-Claimant Roblox Corporation (“Roblox”). I submit this declaration in support of the joint
5 stipulation between Roblox and Plaintiffs to extend Roblox’s deadline to respond to Plaintiffs’
6 Second Amended Complaint (“SAC”), ECF No. 184. I make this declaration based on my personal
7 knowledge. I would testify competently to the matters stated herein.

8 2. Plaintiffs previously filed the First Amended Complaint (“FAC”) on September 30,
9 2024. Roblox answered the FAC on October 30, 2024. ECF No. 117. Roblox subsequently filed
10 an amended answer and cross-claims on November 20, 2024. ECF No. 119.

11 3. During a case management conference on April 24, 2025, the Court set a June 2,
12 2025 deadline to add parties without leave of court. ECF No. 164. The Court subsequently set a
13 case schedule pursuant to a joint stipulation by the parties. ECF No. 165.

14 4. On June 2, 2025, Plaintiffs filed the SAC. ECF No. 184. Pursuant to Fed. R. Civ.
15 P. 15(a)(3), Roblox’s deadline to respond to the SAC is 14 days from the date of service of the
16 SAC. Roblox calculates its current deadline to respond as June 16, 2025. Given the extent and
17 scope of the SAC, Roblox requires additional time to prepare its response.

18 5. On June 10, 2025, I corresponded with Plaintiffs’ counsel by email to request a one-
19 week extension of Roblox’s deadline, such that Roblox’s response to the SAC would be due no
20 later than June 23, 2025. Plaintiffs have agreed to this request.

21 6. The Court first modified the case schedule on September 26, 2024, at the request of
22 the parties. ECF No. 114. The Court modified certain deadlines during a hearing on April 24, 2025.
23 ECF No. 164. The Court further modified the case schedule on May 1, 2025, at the request of the
24 parties. ECF No. 165.

25 7. This is Roblox’s first request to extend its deadline to respond to the SAC. The
26 requested extension does not affect or change any other deadline in the case schedule, including
27 the court-set June 2, 2025 deadline to add parties without leave of court.

28 8. I declare that the foregoing is true and correct.

1 Executed on June 12, 2025 in Washington, D.C.
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3

4 /s/ Robby L.R. Saldaña

5 Robby L.R. Saldaña
6 Attorney for Defendant and Cross-Claimant
7 Roblox Corporation
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